

1 STILEY & CIKUTOVICH, PLLC  
2 1403 W. BROADWAY  
3 SPOKANE, WA 99201  
4 (509) 323-9000  
5  
6

7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA, )  
10 ) No. CR-06-109-WFN  
11 Plaintiff, )  
12 ) DEFENDANT'S SENTENCING  
13 v. ) MEMORANDUM  
14 )  
15 )  
16 DUSTIN M. HAUGEN, )  
17 )  
18 Defendant. )

17 Defendant, Dustin Haugen, by and through his attorney of record, Frank  
18 L. Cikutovich, respectfully submits the following sentencing memorandum in the  
19 above cause.  
20

21 The Defendant will be asking the Court to accept the Plea Agreement filed  
22 pursuant to Fed.R.Crim.P. 11(c)(1)(c), and to impose a sentence of credit for time  
23 served in this case. Defendant respectfully requests, pursuant to U.S.S.G. §5G1.3, that  
24 the Defendant be given credit for the time served at North Fraser Pretrial Centre in  
25 British Columbia, where he was held as a result of these charges. The Defendant  
26

1 submits that he was incarcerated in Canada for approximately 3 months in 2006, and  
2 then turned himself in on April 26, 2011 to be extradited to the United States. It is the  
3 defendant's position that he has served approximately 14 months in custody on this  
4 matter.  
5

6 Defendant's counsel will supply the Court with more specific information  
7 regarding the basis for the request for a sentence of time served at the time of  
8 sentencing. To inform the Court, the basis for the recommendation includes  
9 extraordinary family circumstances and post-offense rehabilitation, along with the  
10 factors under USSG § 3553(a).  
11  
12

13  
14 DATED this 27<sup>th</sup> day of March, 2012.  
15

16 Stiley & Cikutovich, PLLC

17 s/ **Frank L. Cikutovich**  
18 Counsel for Dustin Haugen  
19  
20  
21  
22  
23  
24  
25  
26

1  
2  
3 I hereby certify that on the 27<sup>th</sup> day of March, 2012, I electronically  
4 filed the foregoing with the Clerk of the Court using the CM/ECF System  
5 which will send notification of such filing to the following parties:  
6

7 Aine Ahmed  
8 Assistant United States Attorney  
9 920 W. Riverside Ave.  
Spokane, WA 99201

10  
11 s/*Frank L. Cikutovich*  
12 Counsel for Dustin Haugen  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26